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*Proposed Counsel to Official Committee of Unsecured Creditors*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

Genesis Global Holdco, LLC, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No.: 23-10063 (SHL)

Jointly Administered

Re: Docket No. 15

**THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS' RESERVATION  
OF RIGHTS WITH RESPECT TO THE DEBTORS' CASH MANAGEMENT MOTION**

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<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's tax identification number (as applicable), are: Genesis Global Holdco, LLC (8219); Genesis Global Capital, LLC (8564); Genesis Asia Pacific Pte. Ltd. (2164R). For the purpose of these Chapter 11 Cases, the service address for the Debtors is 250 Park Avenue South, 5th Floor, New York, NY 10003.

The Official Committee of Unsecured Creditors appointed in the above-captioned cases (the “**Committee**”), by and through its undersigned counsel, respectfully states as follows in support of this reservation of rights regarding the Cash Management Motion (as defined herein):

**Reservation of Rights**

The Committee was appointed on February 3, 2023 and promptly selected its proposed professionals. The Committee, with the assistance of its proposed professional advisors, immediately began to analyze—among other things—the matters set for hearing on February 22, 2023 (the “**Second Day Hearing**”). Following good-faith discussions with the Debtors’ professionals, the Committee and the Debtors have significantly narrowed the open issues. However, discussions remain ongoing regarding the *Debtors’ Motion For Entry of Interim and Final Orders (I) Authorizing Debtors to Continue to Operate the Existing Cash Management System, Including Existing Bank Accounts, Honor Certain Prepetition Obligations Related Thereto, and Maintain Existing Business Forms; (II) Permitting Continued Intercompany Transactions and Granting Certain Administrative Claims; (III) Extending the Time to Comply with the Requirements of Section 345 of the Bankruptcy Code and (IV) Granting Related Relief* [Docket No. 15] (the “**Cash Management Motion**”). The Committee will continue to engage with the Debtors regarding the Cash Management Motion prior to the Second Day Hearing. To the extent that any such concerns are not consensually resolved, the Committee reserves all rights regarding further interim or final relief with respect to the Cash Management Motion, including the Committee’s right to be heard at the Second Day Hearing, or such other hearing at which the Cash Management Motion shall be considered, to object to the relief sought therein, and to seek any other appropriate relief from this Court.

Dated: February 17, 2023  
New York, New York

Respectfully submitted,

By: /s/ J. Christopher Shore

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